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May 9, 2018

VIA ECF

Judge Shelley C. Chapman
United States Bankruptcy Court
Southern District of New York
Courtroom 623
One Bowling Green
New York, NY 10004-1408

Re: *In re: Perforadora Oro Negro, S. de R.L. de C.V. et al.* (Case No. 18-11094).

Dear Judge Chapman:

We represent SeaMex Ltd. (“SeaMex”), a competitor of Perforadora Oro Negro, S. de R.I. de C.V., and Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V. (collectively, the “Oro Negro Entities”). On April 20, 2017, Alonso Del Val-Echeverria (“Petitioner”), in his capacity as foreign representative of the Oro Negro Entities, filed a motion [ECF No. 16] (the “Motion”) seeking, among other provisional and additional relief under Sections 1519 and 1521 of the Bankruptcy Code, leave to conduct discovery pursuant to Section 1521(a)(4) of the Bankruptcy Code and Rule 2004 of the Federal Rules of Bankruptcy Procedure, which we understand is returnable May 9, 2018 at 4:00 PM. By this letter, we request a one-week extension of the current deadline to object or otherwise respond to the Motion, as well as a corresponding adjournment of the hearing currently scheduled for May 14, 2018, to the extent that the hearing will address discovery issues affecting SeaMex.

We were retained on Thursday, May 3 and the following day contacted counsel for Petitioner to request the modest extension set forth above to file objections to the Motion, including its request for leave to serve discovery on SeaMex pursuant to the Motion and to the motion seeking recognition of the *Concurso Mercantil*. Petitioner’s counsel refused our request, consenting only to a one-day extension (until Wednesday, May 9). Counsel for Petitioner suggested a willingness to revisit the issue of a longer extension once we were able to advise them whether SeaMex intended to submit an objection to Petitioner’s application for recognition of the *Concurso Mercantil*.

Yesterday, we advised the Petitioner’s counsel that SeaMex does not intend to submit an objection regarding recognition, but rather intends to object solely to the Motion with respect to discovery. Nevertheless, Petitioner again agreed only to a single-day extension – from May 9 to May 10 – for SeaMex to submit objections.

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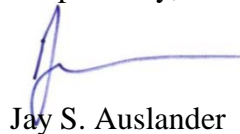
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There is every reason to permit SeaMex a reasonable amount of time to investigate and prepare its objections and no need for the expedited schedule on which Petitioner insists: SeaMex is not a party to this proceeding; SeaMex only recently learned that Petitioner intends to seek discovery from it; SeaMex only recently engaged counsel; and SeaMex receives only scant and cursory mention (at best) in Petitioner's allegations. Counsel for Petitioner has been unable to articulate any harm to it that would result were the hearing on its discovery requests against SeaMex postponed by a mere week.

Accordingly, SeaMex respectfully requests that the Court extend its time to file objections to the Motion until May 16, 2018 and adjourn the hearing on SeaMex's objections to a subsequent date. SeaMex reserves all its rights, including its right to make objections based on lack of personal jurisdiction.

Respectfully,

A handwritten signature in blue ink, appearing to read "Jay S. Auslander", with a long horizontal flourish extending to the right.

Jay S. Auslander